

**UNITED STATES BANKRUPTCY COURT FOR
THE WESTERN DISTRICT OF WISCONSIN**

In Re:

In Bankruptcy No:

**ISRAEL MCKINNEY
JENNIFER MCKINNEY**

Debtor(s).

Case No: 22-11558(Chapter 13)

OBJECTION TO THE CHAPTER 13 TRUSTEE'S MOTION TO DISMISS

Israel and Jennifer McKinney, debtors by their attorneys, PITTMAN & PITTMAN LAW OFFICES, LLC by Greg P. Pittman, hereby objects to the Motion to Dismiss filed by the Chapter 13 Trustee for the following reasons:

- 1) The Debtors have divorced since the chapter 13 case has begun and now are required to file separate tax returns. Jennifer McKinney has prepared her returns and submitted to the Trustee. Israel McKinney has been working out of town and is in process of completing the 2023 tax returns, however, more time is necessary to have these completed and filed.
- 2) The Debtors are current on all other aspects of the chapter 13 case.

Dated this 23rd day of July, 2024 at La Crosse, Wisconsin.

PITTMAN & PITTMAN LAW OFFICES, LLC.

By: s/Greg P. Pittman
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